



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

November 9, 2016

Mr. Tim Shepard  
Riker Properties, LLC  
35 W. Huron Street  
Pontiac, MI 48342

Mr. Tim Shepard  
Riker Properties, LLC  
3297 Orchard Lake Road, Suite 208  
Keego Harbor, MI 48320

SRN: U631611912, Oakland County

Dear Mr. Shepard:

**VIOLATION NOTICE**

On November 2, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the Riker Building located at 35 W. Huron, Pontiac. The purpose of this inspection was to determine Riker Properties, LLC's compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, Riker Properties, LLC owns the facility and performed the renovation activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, DEQ staff Tammy S. Bell and Craig Dechy noted that walls, ceilings and pipe insulation had been disturbed during renovation activities on the 10th floor of the building. An asbestos survey had not been conducted prior to renovation activities. The pipe insulation tested positive for asbestos but was less than the asbestos NESHAP threshold quantity of 260 linear feet.

Process Description	Section Violated	Comments
Renovation activities at the Riker Building located at 35 W. Huron St., Pontiac.	§61.145(a)	Failure to thoroughly inspect for asbestos

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 30, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

Mr. Tim Shepard  
Page 2  
November 9, 2016

dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Riker Properties, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of 35 W. Huron, Pontiac. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy S. Bell  
Senior Environmental Quality Analyst  
Air Quality Division  
313-330-0105

Enclosure: Sample results

cc: Mr. Michael Wilson, Building Official, City of Pontiac  
Ms. Lynn Fiedlèr, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Joyce Zhu, DEQ  
Mr. Craig Dechy, DEQ